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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DAVID RICHARD,

Plaintiff.

VS.

RELIANT HOLDINGS, LTD.; RELIANT DRY ICE LTD d/b/a RELIANT DRY ICE LIMITED PARTNERSHIP; RELIANT EMPLOYMENT SERVICES LTD. d/b/a RELIANT EMPLOYMENT SERVICES LIMITED PARTNERSHIP; "DOE(S) 1-100" employees of RELIANT HOLDINGS, LTD., RELIANT DRY ICE LTD. d/b/a RELIANT DRY ICE LIMITED PARTNERSHIP, and/or RELIANT EMPLOYMENT SERVICES LTD. d/b/a RELIANT EMPLOYMENT SERVICES LIMITED PARTNERSHIP; and "CORP ORATION(S) XYZ 1-100,"

Defendants.

Civil Action No. 2:24-cv-00724-BJR

STIPULATION FOR LEAVE FOR **DEFENDANTS TO FILE AMENDED** ANSWER TO PLAINTIFF'S COMPLAINT AND ORDER

I. **STIPULATION**

IT IS HEREBY STIPULATED by and between Defendants Reliant Holdings, LTD., Reliant Dry Ice LTD. d/b/a Reliant Dry Ice Limited Partnership; Reliant Employment Services LTD. d/b/a Reliant Employment Services Limited Partnership ("Defendants") and David Richard ("Plaintiff") that Defendants may file an Amended Answer with Affirmative Defenses.

This Stipulation is made pursuant Fed. R. Civ. P. 15(a)(2), which allows amendment(s)

STIPULATION FOR LEAVE FOR DEFENDANTS TO FILE AMENDED ANSWER TO PLAINTIFF'S COMPLAINT- 1 2:24-cv-00724-BJR

LEWIS BRISBOIS BISGAARD & SMITH LLP 1111 Third Avenue, Suite 2700 Seattle, Washington 98101 206.436.2020

1	without motion to the court on written consent of the parties. A copy of the proposed Amended
2	Answer with tracked changes is filed concurrently with this stipulation.
3	By executing this stipulation, no party herein waives, but specifically reserves any
4	previously held rights, claims, and/or defenses.
5	DATED December 2, 2024.
6	Presented by:
7	LEWIS BRISBOIS BISGAARD & SMITH LLP
8	<u>s/Christopher E. Hawk</u> Christopher E. Hawk, WSBA #43307
	Christopher E. Hawk, WSBA #4550/
10	<u>s/Kaytlin L. Carlson</u> Kaytlin L. Carlson, WSBA #52606
11	1111 Third Avenue, Suite 2700
12	Seattle, Washington 98101 (206) 436-2020
13	<u>Chris.Hawk@lewisbrisbois.com</u>
14	Kaytlin.Carlson@lewisbrisbois.com Attorneys for Defendants
15	
16	AKW Law, PC
17	
18	s/Ada Wong Ada Wong, WSBA #45936
19	
20	s/Rolf Gardner Toren Rolf Gardner Toren, WSBA #58597
21	12055 15th Avenue NE, Suite 200 Seattle, WA 98125
22	(206) 259-1259 / (855) 925-9529
23	Attorneys for Plaintiff
24	
25	
26	
27	

STIPULATION FOR LEAVE FOR DEFENDANTS TO FILE AMENDED ANSWER TO PLAINTIFF'S COMPLAINT- 2 2:24-cv-00724-BJR

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PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED

DATED this 2nd day of December, 2024.

Barbara Jacobs Rothstein

Barbara Jacobs Rothstein U.S. District Court Judge

STIPULATION FOR LEAVE FOR DEFENDANTS TO FILE AMENDED ANSWER TO PLAINTIFF'S COMPLAINT- 3

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